

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re: CIAH NADIN BANKS,

Debtor.

CIAH NADIN BANKS,

Plaintiff,

UNITED STATES DEPARTMENT OF
EDUCATION,

Defendants.

Case No. 20-41184

Chapter 7

Hon. Mark A. Randon

Adv. Pro. No. 21-04026

Hon. Mark A. Randon

**DEFENDANT UNITED STATES DEPARTMENT OF EDUCATION'S
INITIAL DISCLOSURES PURSUANT TO FED. R. CIV. P. 26(a)**

Now comes Defendant, United States of America, by and through its attorneys, Saima S. Mohsin, United States Attorney for the Eastern District of Michigan, and John Postulka, Assistant United States Attorney, and pursuant to Federal Rule of Civil Procedure 26(a)(1), makes the following disclosures, without the benefit of any discovery:

Individuals Likely to Have Discoverable Information, Addresses and Telephone numbers for These Individuals, and Type of Information They May Possess

Name	Contact	Type of Information
Rhoda Terry or other Loan Analyst U.S. Dept. of Education	U.S. Dept. of Education Federal Student Aid 50 United Nations Plaza San Francisco, CA 94102 (415) 486-5357**	Origination and status of Debtor's student loans, including available administrative repayment programs. **Contact only through the undersigned.
Debtor	Ciah Nadin Banks P.O. Box 2373 Detroit, MI 48202	Origin, purpose, and status of student loans including efforts of repayment. All facts related to the claim of "undue hardship."

The address and telephone number for the government personnel listed above have been provided in accordance with Federal Rule of Civil Procedure 26(a). The individual(s), however, should not be contacted directly but, instead, may be reached through the undersigned counsel.

Documents with Description and Location

DESCRIPTION	LOCATION
Certificates of indebtedness; records of payments or lack thereof	United States Dept. of Education file
Loan applications and promissory notes	United States Dept. of Education file

Computation of Damages

The United States is unaware of any damages that would be applicable to this case.

Insurance Agreement

The United States is unaware of any insurance agreement that would be applicable to this case.

Defendant reserves the right to amend its disclosures to add additional individuals or documents.

Respectfully submitted,

Dated: April 22, 2021

SAIMA S. MOHSIN
United States Attorney

/s/John Postulka
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